

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN**

In re)
) Chapter 9
)
CITY OF DETROIT, MICHIGAN,) Case No. 13-53846
)
Debtor.) Hon. Steven W. Rhodes
)

**CERTIFICATION OF STEPHEN C. HACKNEY PURSUANT TO THE
COURT’S ORDER GRANTING MOTION TO COMPEL FULL
CLAWBACK OF DEBTOR’S DOCUMENT PRODUCTION AND
RELATED RELIEF**

STEPHEN C. HACKNEY hereby certifies as follows:

1. I am over the age of 18 and am a partner at the law firm of Kirkland & Ellis, counsel for Syncora Capital Assurance Inc. and Syncora Guaranty Inc. (“Syncora”).

2. On May 6, 2014, Kirkland and Ellis received the Debtor’s Production¹ in the form of a hard drive containing the documents the Debtor was producing.

3. In accordance with the the Court’s *Order Granting Motion to Compel Full Clawback of Debtor’s Document Production and Related Relief* [Doc. No. 4710] (the “Clawback Order”), on May 13, 2014 Kirkland & Ellis sent the

¹ Capitalized terms not defined herein have the meanings given to them in the Court’s *Order Granting Motion to Compel Full Clawback of Debtor’s Document Production and Related Relief* [Doc. No. 4710].

Production to the address specified in paragraph 2 in the Clawback Order via overnight delivery. (*See Hackney Letter to M. Hale*, attached hereto as Exhibit 1.)

4. Kirkland & Ellis received confirmation of the overnight delivery service returning the Production. (*See Exhibit 2.*)

5. Kirkland & Ellis has destroyed all electronic or physical copies of the Production or any portion of the Production. Kirkland & Ellis did not create any work product reflecting the contents of the documents in the Production. Thus, Kirkland & Ellis has complied with the provisions of paragraph 2 of Court's Clawback Order.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 14, 2014

/s/ Stephen C. Hackney
Stephen C. Hackney